

Supreme Court of Pennsylvania

Court of Common Pleas
Civil Cover SheetMontgomery

County

For Prothonotary Use Only:

Docket No:

FILED

The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

Commencement of Action:

- ☒ Complaint ☐ Writ of Summons ☐ Petition
☐ Transfer from Another Jurisdiction ☐ Declaration of Taking

Lead Plaintiff's Name:

Mr Orlando Bacz, (ID# CB/3721)

Lead Defendant's Name:

Anthony Letizio, MD: et al.Are money damages requested? ☒ Yes ☐ NoDollar Amount Requested: ☐ within arbitration limits
(check one) ☒ outside arbitration limitsIs this a Class Action Suit? ☐ Yes ☒ NoIs this an MDJ Appeal? ☐ Yes ☒ NoName of Plaintiff/Appellant's Attorney: Mr. Orlando Bacz, ID# CB-3721☒ Check here if you have no attorney (are a Self-Represented [Pro Se] Litigant)

Nature of the Case: Place an "X" to the left of the **ONE** case category that most accurately describes your **PRIMARY CASE**. If you are making more than one type of claim, check the one that you consider most important.

TORT (do not include Mass Tort)

- ☐ Intentional
☐ Malicious Prosecution
☐ Motor Vehicle
☐ Nuisance
☐ Premises Liability
☐ Product Liability (does not include mass tort)
☐ Slander/Libel/ Defamation
☒ Other:
Deliberate Indifference
Retaliation, Due Process, etc.

MASS TORT

- ☐ Asbestos
☐ Tobacco
☐ Toxic Tort - DES
☐ Toxic Tort - Implant
☐ Toxic Waste
☐ Other:

PROFESSIONAL LIABILITY

- ☐ Dental
☐ Legal
☐ Medical
☐ Other Professional:

CONTRACT (do not include Judgments)

- ☐ Buyer Plaintiff
☐ Debt Collection: Credit Card
☐ Debt Collection: Other

☐ Employment Dispute:
Discrimination
☐ Employment Dispute: Other

☐ Other:

REAL PROPERTY

- ☐ Ejectment
☐ Eminent Domain/Condemnation
☐ Ground Rent
☐ Landlord/Tenant Dispute
☐ Mortgage Foreclosure: Residential
☐ Mortgage Foreclosure: Commercial
☐ Partition
☐ Quiet Title
☐ Other:

CIVIL APPEALS

- Administrative Agencies
☐ Board of Assessment
☐ Board of Elections
☐ Dept. of Transportation
☐ Statutory Appeal: Other

☐ Zoning Board
☐ Other:

MISCELLANEOUS

- ☐ Common Law/Statutory Arbitration
☐ Declaratory Judgment
☐ Mandamus
☐ Non-Domestic Relations
☐ Restraining Order
☐ Quo Warranto
☐ Replevin
☐ Other:

7

Orlando Buez

Plaintiff,

VS.

NO.

23-06203

Anthony Letizio, MD: et al.
Defendants,

NOTICE TO DEFEND-CIVIL

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

LAWYER REFERENCE SERVICE
MONTGOMERY BAR ASSOCIATION
100 West Airy Street (REAR)
NORRISTOWN, PA 19401
(610) 279-9660, EXTENSION 201

2023 APR 11 P 2:57

IN THE COURT OF COMMON PLEAS OF MONTGOMERY
COUNTY, PENNSYLVANIA

Orlando Baez,
Plaintiff,

Vs.

Anthony Letizio, MD; Med. Dir.;
Stephen Kaminsky, PA; Phys. Assist;
et al;
Sued In Their Official
And Individual Capacities.
Defendants.

Case No#.

23-06203

CIVIL ACTION

JURY TRIAL DEMANDED

COMPLAINT/INJUNCTION

Introduction

This is a §1983 Civil Action, filed by Plaintiff, Orlando Baez, a state prisoner, for damages and injunctive relief, alleging Retaliation and Deliberate Indifference.

Jurisdiction And Venue

1.) Jurisdiction is invested in this Court of Common Pleas, of Montgomery County, Pennsylvania. Pursuant to 42 Pa. C.S.A. §931(a) and Venue is established pursuant to 42 Pa. C.S.A. §931(c) and Rule 1006(a)(1) of the Pennsylvania Rules of Civil Procedure. Therefore, the jurisdiction and venue is within the Court of Common Pleas, of Montgomery County, Pennsylvania is appropriate for it is where the events giving rise to the claims occurred.

Parties

2.) PLAINTIFF: Orlando Baez, (Plaintiff Baez Hereafter), is and was at all times mentioned herein a prisoner of the State of Pennsylvania, in the care, custody and control, of the Pennsylvania Department of Corrections. Plaintiff, is currently confined in Pennsylvania State Prison at SCI. Phoenix.

- 3.) Plaintiff Baez, has a mailing address of, Orlando Baez, (ID# CB-3721), SCI Phoenix Prison 1200 Mokychic Drive., Collegeville, PA. 19426.
- 4.) DEFENDANT: Dr. Anthony Letizio, (Defendant Letizio Hereafter) is a licensed professional and is practicing in the speciality of a Medical Doctor, and is acting as the Medical Director, at SCI Phoenix Prison.
- 5.) Defendant Letizio, maintains a practicing address of, 1200 Mokychic Drive, Collegeville, (Montgomery County), Pennsylvania 19426.
- 6.) DEFENDANT: PA. Stephen Kaminsky, (Defendant Kaminsky Hereafter) is a licensed professional practicing in the speciality of Physician Assistant, at SCI Phoenix Prison.
- 7.) Defendant, Kaminsky, maintains a practicing address of, 1200 Mokychic Drive, Collegeville (Montgomery County), Pennsylvania 19426, at SCI Phoenix Prison.
- 8.) Each Defendant, is being sued individually and in his official capacity. At all times mentioned in this Complaint, each Defendant acted under the color of state law.
- 9.) Each Defendant, is being sued for "retaliation and Deliberate Indifference", for the denial of medical care.

Facts

- 10.) Plaintiff Baez, has been diagnosed by the D.O.C.'s Specialist(s), with Systemic Lupus Erythematosus, Spinal Stenosis, Osteoporosis of the Cervical Spine, Rheumatoid Arthritis, Fibromyalgia, Myositis, Degenerative Bone Disease, C.O.P.D., Subcutaneous Skin Lupus Outbreaks and Sjogrens Syndrome, with other serious chronic diseases.
- 11.) Plaintiff Baez, depends on a "wheelchair pusher", to take him to and from where Plaintiff Baez, needs to be.

- 12.) On December 6, 2021, at around 1:35pm. Plaintiff Baez, **notified** Sgt. Pluhar, that no one showed up to conduct sick call consult.
- 13.) On December 6, 2021, at around 4:20pm. Plaintiff Baez, was **notified** that the sick call doctors was here and wanted to see Plaintiff Baez, in the triage room.
- 14.) Defendant Letizio and Kaminsky, began **provoking** Plaintiff Baez by stating; "Your medical illnesses and symptoms are not chronic issues. You (Baez) are just a complainer, who enjoys filing grievances against medical, and if you like to file a grievance against us, we do not care".
- 15.) Defendant Letizio also stated: "You no longer will receive medical care for your ongoing complaints, the medication you receive now is it. You will no longer receive anything else, there is nothing else we will do for you or can do for you.
- 16.) Defendant Letizio and Kaminsky, made it clear to Plaintiff Baez, when they stated: "Your systemic lupus erythematosus, subcutaneous skin lupus outbreaks, c.o.p.d, degenerative bone disease, and all your other over lapping symptoms from which you suffer, are not chronic illnesses.
- 17.) On December 8, 2021, Plaintiff Baez, filed a grievance about the above incident.
- 18.) On December 16, 2021, Plaintiff Baez, was forced to be "transported" to Temple Hospital Lupus Center, in a (mini van) instead of a (wheelchair van), as prescribed in Plaintiff Baez's medical file.
- 19.) Upon Plaintiff Baez **exiting** the mini-van, Plaintiff Baez **twisted** "his knee" and "reported" the incident immediately.
- 20.) On December 28, 2021, at around 1:00pm. The Unit Manager Ms. Rupter, **ordered** Plaintiff Baez, to "gather all his special medical items", so he may take them to medical.

- 21.) At the infirmary, the nurse (Roc) informed Plaintiff Baez, that he (Roc) was ordered to confiscate all of Plaintiff Baez's special medical items.
- 22.) Nurse Roc, stated: "That it was Defendant Letizio, who had ordered the confiscation of all of Plaintiff Baez's special medical items.
- 23.) Few minutes later, Defendant Letizio, entered the infirmary very up-set and hostile towards Plaintiff Baez, for complaining about Defendants Letizio and Kaminsky, and Plaintiff Baez's grievances.
- 24.) Defendant Letizio, admitted that (He) ordered, to confiscate all of Plaintiff Baez's special medical items.
- 25.) Defendant Letizio, then stated: "That (He) will personally contact the Rheumatologists at Temple Hospital and order them to "only" evaluate (Baez) for his Lupus and nothing else".
- 26.) Defendant Letizio, then stated: "That (He) will personally take over all of Plaintiff Baez's medical complaints, and what ever I (Letizio) say-goes, whether You (Baez) like it or not, and that's final".
- 27.) On January 4, 2022, Plaintiff Baez, was escorted to intake to be transported to Temple Hospital, for an Audiology Consultation.
- 28.) Staffs refused to put Plaintiff Baez, in a wheelchair-van.
- 29.) Plaintiff Baez, was then taken to the medical triage and spoke with Nurse Ed.
- 30.) Nurse Ed, told Plaintiff Baez that, Defendant Letizio stripped Plaintiff Baez of the wheelchair-van order, on December 28, 2021, along with all the other speciality medical items.
- 31.) On January 12, 2022, Plaintiff Baez, filed a grievance against Defendants Letizio and Kaminsky.
- 32.) On January 28, 2022, Defendant Kaminsky, called Plaintiff Baez to the medical triage. Where Plaintiff Baez, stated to the Defendant Kaminsky, what Nurse Ed told him (Baez), about the wheelchair van order, was stripped away.

33.) Defendant Kaminsky, then checked Plaintiff Baez's medical file and stated; "That Plaintiff Baez's medical file states that, Plaintiff Baez is to be transported in a wheelchair van only".

34.) On or about February 4, 2022, Plaintiff Baez, was called to get his new glasses.

35.) The glasses were not the correct prescription.

36.) On or about February 15, 2022, Plaintiff Baez, had taken a very hard fall, when he loss his balance, trying to get up from his chair.

37.) Plaintiff Baez, requested to have his speciality medical items back.

38.) On or about February 28, 2022, Plaintiff Baez, experienced another hard fall in his cell.

39.) This is the second time Plaintiff Baez, has had a serious fall with serious injuries to himself, because of the confiscation of Plaintiff Baez's speciality medical items.

40.) On or about March 1, 2022, Plaintiff Baez, was seen by PA. Norma and Plaintiff Baez, reported his injuries and asked for his speciality items to be given back to him.

41.) On or about March 18, 2022, Plaintiff Baez, sent a request slip to Defendant Letizio, and RN George, requesting information about his new glasses.

42.) On or about March 21, 2022, Plaintiff Baez, was told by Mr. Angell, who is Plaintiff Baez's criminal attorney, that Plaintiff Baez was scheduled for a (90 days) follow-up appointment, with the Rheumatologist Specialists at Temple Hospital Lupus Center, for January 19, 2022.

43.) Plaintiff Baez, was never told or taken to the appointment, Plaintiff Baez filed a grievance to find out, why Plaintiff was not told or taken to the appointment.

- 44.) On or about March 22, 2022, Plaintiff Baez talked with Defendant Letizio, about his eye glasses, and asked for his medical items back.
- 45.) On or about March 30, 2022, Plaintiff Baez saw Defendant Kaminsky, and tried to address all his chronic medical problems and asked for his medical items back.
- 46.) Defendant Kaminsky, refused to do anything about Plaintiff Baez's chronic medical problems, and would not return Plaintiff Baez's medical items.
- 47.) On or about April 3, 2022, Plaintiff Baez, fell for the third time due to not having his knee brace and knee sleeve. Because, Defendants Letizio and Kaminsky had taken them from Plaintiff Baez.
- 48.) On or about April 8, 2022, Plaintiff Baez fell for the fourth time, again injuring himself, because Defendants Letizio and Kaminsky refuse to return Plaintiff Baez's medical items back.
- 49.) On or about April 11, 2022, PA. Akenten, handed Plaintiff Baez his knee brace and knee sleeve back, and was not provided treatment for his injuries.
- 50.) On or about April 12, 2022, Plaintiff Baez, saw Defendant Kaminsky, where Plaintiff Baez asked about his appointment with the Rheumatologists at Temple Hospital Lupus Center, which Defendant Kaminsky stated that; "Defendant Letizio, approved Plaintiff Baez for an appointment, with the Rheumatologist".
- 51.) On or about April 22, 2022, Plaintiff Baez, was told by CO. Gosner, that his eye glasses are ready for pick-up.
- 52.) When Plaintiff Baez, picked-up his eye glasses, again they were the wrong prescription.
- 53.) On or about April 22, 2022, Plaintiff Baez sent a request slip, regarding his eye glasses.
- 54.) On or about May 2, 2022, Plaintiff Baez, was sent to the Wills Eye Center, and was given eye drops that Plaintiff Baez could not use, because it made Plaintiff Baez's condition worse.

Plaintiff Baez condition worse.

55.) On or about May 6, 2022, Plaintiff Baez, was given new eye drops.

56.) On or about May 16, 2022, Plaintiff Baez, was called to the infirmary and received a hearing aid device.

57.) The hearing aid caused excruciating inner ear pain, to Plaintiff Baez.

58.) On or about May 22, 2022, Plaintiff Baez, sent a request slip, asking about his new eye glasses.

59.) On or about May 30, 2022, Plaintiff Baez, filed a grievance against Defendants Letizio and Kaminsky, for denying and interfering, with Plaintiff Baez's medical treatment.

60.) On or about June 13, 2022, Plaintiff Baez, was forced to submit a request slip, to Ms. Fernandez, who is P-Block's "Psychiatric", for the stress, depression and chronic pain, caused by the Defendants' Letizio and Kaminsky actions/inactions.

61.) On or about June 16, 2022, Plaintiff Baez, submitted a request slip to Defendant Letizio, asking about his denial of Plaintiff Baez's refresh optive advance eye drops.

62.) On or about June 16, 2022, Plaintiff Baez, spoke with Ms. Fernandez ("Psychiatric"), about Plaintiff Baez's stress, depression, mental state, and chronic conditions, etc.

63.) On or about June 17, 2022, Plaintiff Baez, made an "Abuse Against Inmate By DOC Staffs Hotline Complaint".

64.) On or about June 17, 2022, Plaintiff Baez, filed a grievance against Defendants Letizio and Kaminsky, for interfering with prescribed medical treatment.

65.) On or about June 20, 2022, Plaintiff Baez, spoke with Defendant Letizio, and asked about Plaintiff's treatment at Temple Hospital Lupus Center.

66.) Defendant Letizio, stated: "Mr. Baez, you did not have a 90 days follow-up lupus appointment for January 19, 2022, or April 2022. Plus, the Rheumatologist Specialists at Temple never requested a follow-up appointment and Temple never scheduled an appointment for the dates you claim. However; an appointment has been approved by myself, and WellPath, for you to see the Rheumatologist. And you'll be sent soon".

67.) On or about June 22, 2022, Plaintiff Baez, sent a request slip to Defendant Letizio, asking about Plaintiff's medical treatment.

68.) On or about July 5, 2022, Plaintiff Baez, filed a grievance on Defendant Letizio, for not answering Plaintiff's request slip, as DOC Policy states must be done.

69.) On or about July 7, 2022, Plaintiff Baez, had talked to his sister Mrs. Juanita B. Rodriguez, to call Temple Hospital Lupus Center, and ask about Plaintiff Baez's treatment.

70.) Mrs. Rodriguez, stated that, Temple Hospital Lupus Center, has her brother (Orlando Baez), as being a no-show, and that, "We (Temple Hospital Lupus Center) never terminated Mr. Baez's treatment, and We still have Mr. Baez, as our patient".

71.) On or about July 14, 2022, Plaintiff Baez, filed a grievance against Defendant Letizio, removing Plaintiff from his Medical Allowance Status.

72.) On or about July 22, 2022, Plaintiff Baez, sent a request slip to Defendant Letizio, about the medication Prednisone, that was not re-ordered.

73.) On or about August 5, 2022, Plaintiff Baez, sent a request slip to Ms. Huner, CHCA; asking about his medical treatment.

74.) On or about August 5, 2022, Plaintiff Baez, submitted a sick call slip, because his medication never got renewed.

75.) On or about August 8, 2022, Plaintiff Baez, submitted a sick call slip, to have his medical allowance status reinstated.

76.) On or about August 8, 2022, Plaintiff Baez, went for his pain medication and was told by RN Tom and RN George, that Plaintiff Baez cannot get his pain medication, because Defendant Letizio never renewed them.

77.) On or about August 14, 2022, Plaintiff Baez, submitted another sick call slip, to have his medical allowance status reinstated.

78.) On or about August 15, 2022, Plaintiff Baez, was seen by a physician PA. Mitchell, and had his medical allowance status reinstated.

COUNT - ONE

RETALIATION

ORLANDO BAEZ Vs. ALL DEFENDANTS

79.) Plaintiff, Orlando Baez, incorporates paragraphs (1) through (78) and set forth the same herein at length.

80.) As a direct and proximate results of the Defendants' retaliatory conduct, as set forth elsewhere in this Complaint, Plaintiff has suffered the following injuries, some of which are permanent:

I) A permanent fear that the Medical Department, will make Plaintiff Baez wait for services and treatment when needed in a timely manner;

II) Pain and suffering from chronic systemic lupus erythematosus, which Plaintiff Baez, has not been to the lupus clinic, for over 17 1/2 months;

III) Pain and suffering from S'Jogrens Syndrome, which the Defendants refuse to follow the recommendations, prescribed by the Specialist(s);

IV) Pain and suffering from spinal stenosis and osteoporosis of the cervical spine, which the Defendants have not done treatment;

V) Pain and suffering from degenerative bone disease, which the Defendants have not done treatment;

VI) Pain and suffering from side effects from all the chronic conditions, from which the Defendants have not done treatment;

VII) As a further direct and proximate results the Defendants' **retaliation**, as set forth elsewhere in this Complaint. Plaintiff Baez, Plaintiff has suffered and will continue to suffer for an indefinite time into the future, because of no treatment for Plaintiff Baez's medical conditions, and for the mental and emotional distress, as caused by the Defendants' actions/inactions, omissions, retaliation, and deliberate indifference, to multiple serious medical chronic conditions.

VIII) The actions of the Defendants Letizio and Kaminsky, refusing medical treatment and removing speciality medical items from Plaintiff Baez, was done **maliciously and sadistically to cause harm to Plaintiff Baez.**

COUNT - TWO

DELIBERATE INDIFFERENCE

ORLANDO BAEZ Vs. ALL DEFENDANTS

81.) Plaintiff Orlando Baez, incorporates paragraphs (1) through (80) and set forth the same herein at length.

82.) As a direct and proximate results of the Defendants **Deliberate Indifference Conduct**, as set forth elsewhere in this Complaint. Plaintiff has suffered the following injuries, some of which are permanent:

I) A permanent fear that the Medical Department, will make Plaintiff Baez wait for services and treatment when needed in a timely manner;

II) Pain and suffering from chronic systemic lupus erythematosus, which Plaintiff Baez, has not been to the lupus clinic, for over 17 1/2, months;

III) Pain and suffering from S'Jogrens Syndrome, which the Defendants refuse to follow the recommendations, prescribed by the Specialist(s);

IV) Pain and suffering from spinal stenosis and osteoporosis of the cervical spine, which the Defendants have not done treatment;

V) Pain and suffering from degenerative bone disease, which the Defendants have not done treatment;

VI) Pain and suffering from side effects from all the chronic conditions, from which the Defendants have not done treatment;

VII) As a further direct and proximate results of the Defendants' **Deliberate Indifference**, as set forth elsewhere in this Complaint. Plaintiff Baez, has suffered and will continue to suffer for an indefinite time into the future, because of no treatment for Plaintiff Baez's medical conditions, and for the mental and emotional distress, as caused by the Defendants' actions/inactions, omissions, deliberate indifference, and retaliation, to multiple serious medical chronic conditions;

VIII) The actions of the Defendants Letizio and Kaminsky in refusing medical treatment and removing speciality medical items from Plaintiff Baez, was done **maliciously and sadistically to cause harm to Plaintiff Baez.**

RELIEF REQUESTED

WHEREFORE: Plaintiff Baez, respectfully pray that this Court enter judgment:

83.) Granting Plaintiff Baez, a **Declaration** that the acts and omissions, described herein, Violated (Baez) rights, under the Constitution and State Laws;

84.) A Preliminary and Permanent Injunction **Ordering**, Defendants Letizio and Kaminsky, to treat Plaintiff Baez's **Chronic Medical Conditions**, and **Stop Retaliating** against Plaintiff;

85.) Granting Plaintiff Baez, compensatory damages in the amount of \$250,000.00, against each Defendant jointly and severally;

86.) Granting Plaintiff Baez, nominal damages and punitive damages, in the amount

of \$125,000.00, against each Defendant jointly and severally;

87.) Plaintiff Baez, also seeks a jury trial on all issues triable by jury;

88.) Grant such other relief, as it may appear that Plaintiff Baez, is entitled;

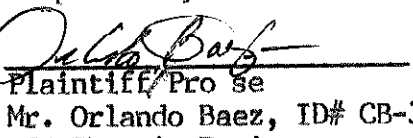
EXHAUSTION OF ADMINISTRATIVE REMEDIES

89.) The Plaintiff, has exhausted his available administrative remedies with respect to all claims and all Defendants.

Date: 4/6/, 2023

cc:

Respectfully Submitted:


Plaintiff Pro Se
Mr. Orlando Baez, ID# CB-3721
SCI Phoenix Prison
1200 Mokychic Drive.
Collegeville, PA. 19426

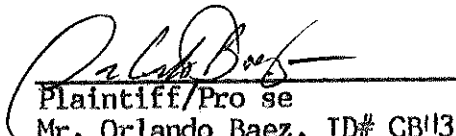
VERIFICATION

I have read the foregoing Complaint, and hereby verify that the matters alleged therein are true; except as to those matters alleged on information, and belief, and as to those I believe to be true. I certify under penalty of perjury, that the foregoing is true and correct pursuant to 28 U.S.C. §1746 and 18 Pa. C.S.A. §4904, Pa.R.CIV.P.

Date: 4/6/, 2023

cc:

Respectfully Submitted:



Plaintiff/Pro se
Mr. Orlando Baez, ID# CB13711
SCI Phoenix Prison
1200 Mokychie Drive.
Collegeville, PA. 19426

IN THE COURT OF COMMON PLEAS OF MONTGOMERY
COUNTY, PENNSYLVANIA

Orlando Baez,
Plaintiff,

Vs.

Anthony Letizio, MD; Med. Dir.;
Stephen Kaminsky, PA; Phys. Assist;
et, al.,
Sued In Their Official
And Individual Capacities.
Defendants.

Case No#.

CIVIL ACTION

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

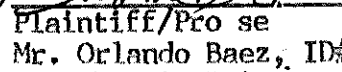
I, Orlando Baez, Plaintiff/Pro se; hereby certify that on this day I am serving a true and correct copy of the foregoing document COMPLAINT/INJUNCTION, in the manner as indicated below, which satisfies Rule 5(b) of the Federal Rules of Civil Procedures.

SERVICE BY FIRST CLASS MAIL
ADDRESSED TO:

1.) Prothonotary Office
In The Court of Common Pleas of
Montgomery County, Pennsylvania
Montgomery County Courthouse
Swede And Airy St.
P.O. BOX 311#
Norristown, PA. 19404-0311

Date: 4/6/2023
cc:

Respectfully Submitted:


Plaintiff/Pro se
Mr. Orlando Baez, ID# GB13721
SCI Phoenix Prison
1200 Mokyche Drive.
Collegeville, PA. 19426